

A. 2
6/24/96

June 24, 1996



Leah Evison
U.S. Environmental Protection Agency
77 West Jackson Blvd. (SR-6J)
Chicago, IL 60604

RE: Revised RD Work Plan, Albion-Sheridan Township Landfill Calhoun County,
Michigan

Dear Leah:

We received two copies of the above referenced document on June 18, 1996. We have reviewed the revised text vs. our original comments. There were still several original EARTH TECH comments not addressed and I would like to bring them to your attention.

Telephone

616.942.9600

Facsimile

616.942.6499

In their cover letter dated June 17, 1996, WCC indicates that the abandonment of monitoring wells will be addressed in the RA Work Plan. This is acceptable to us as long as they realize they will likely have to mobilize a drill rig for this work. Our recommendation would be that they overdrill the existing wells, pull out the wells, and grout the borehole using a tremmie pipe from the bottom up. Properly abandoning the boreholes is particularly critical with the leachate wells.

Original comment - Work Plan

Page 3-4, Section 3.2.3, Additional Monitoring Wells

This well should be identified as MW15SB, not MW155B.

Original comments - Field Sampling Plan

Page 4-2, Section 4.1.3, Paragraph 2

The revised document provides additional detail on sampling. However, the text states that the VAS will continue to the base of the *weathered bedrock*. This particular well, MW15SB, is intended to extend into the shallow, competent bedrock, not the weathered bedrock. In addition, the text states that the "Results of the RI found that the results of the vertical ground water sampling did not indicate a preferred sampling zone within the unweathered portion of the bedrock; therefore, shallow bedrock wells were all set approximately ten feet below the top of the unweathered bedrock." The screened intervals of the shallow bedrock wells were selected based on the VAS results and downhole geophysical logs. EARTH TECH

Leah look at OAPP

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recommends that at least one or two sampling intervals extend into the competent bedrock at this location. The screened interval should be selected after an evaluation of the VAS.

Page 4-6, Section 4.4.1, Paragraph 1

EARTH TECH recommends that the sample collected for mercury should also be field filtered. *as/why?*

Page 4-6, Section 4.4.2, Paragraph 2

The original comment has not been addressed. EARTH TECH believes that at the very least, DO and Eh should be monitored during purging to assess whether or not the well has stabilized. *(arsenic connection)*

Page 4-6, Sections 4.4.1 and 4.4.2

The original comment has not been addressed. I.e., how will investigators evaluate the data and compensate or explain differences? EARTH TECH recommends that during the first round of O&M monitoring, 10% of the samples be collected with a bailer and a pump.

Table 3

This table was not modified to reflect this comment. *yes it was*

SOP-01, Section 3 (comment 1)

Please specify the material and diameter of the temporary casing.

SOP-01, Section 3 (comment 2)

The local public water supply has been specified but the second portion of this comment has not been addressed. Will it be sampled?

SOP-01, Section 3 (comment 4)

This comment was not addressed.

SOP-01, Section 3 (comment 5)

The wording has been modified to address part of this comment, however, what would qualify as "repeat as necessary" with respect to VAS.

SOP-01, Section 3 (comment 6)

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The last three bullets of this comment have still not been addressed.

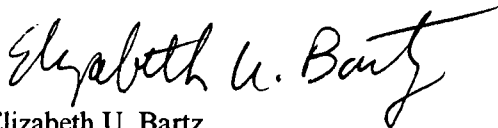
SOP-01, Section 5.1, Paragraph 5

Bumper posts were required during the RI on the property to the west of the Albion-Sheridan Township Landfill due to the ATV traffic experienced on this property on weekends.

Leah, please call me if you have any questions regarding these comments.

Sincerely yours,

EARTH TECH, INC.



Elizabeth U. Bartz
Site Project Manager

